REMARKS

This is in response to the Office Action mailed September 21, 2004. The Office Action rejected Applicants' Claims 18, 20-22 and 24-28 as being anticipated by U.S. Pat. No. 6,414,402 ("Polyakov") and rejected Claims 1-17, 19 and 23 as obvious in view of the combination of U.S. Publication 2004/0076279 ("Taschereau") and Polyakov.

With this response, Applicants have amended Claims 18, 20 and 28. Applicants respectfully request reconsideration of Claims 1-28 in view of the following remarks. Applicants submit that Claims 1-28 are in condition for allowance.

Claim 1

Applicants' independent Claim 1 was rejected as being obvious in view of the combination of Polyakov and Taschereau. Claim 1 relates to a method of facilitating delivery of advertising to users of mobile computing platforms. Claim 1 recites in a geographic database associating with each data entity that represents a road segment data that indicate in which of said advertising zones the road segment is located. Claim 1 is not obvious in view of the combination of Polyakov and Taschereau because the combination does not disclose or suggest this claim element.

First, Polyakov discloses a system that provides advertising on display screens mounted on the exterior of mobile vehicles, such as a type of mobile billboard. (*see*: Polyakov: FIG. 3, column 2, lines 54-59). Although Polyakov discloses the mobile vehicles having a location determination means with GPS (*see*: Polyakov: column 2, lines 59-67), Polyakov completely fails to mention a geographic database in which data entity that represents a road segment is associated with data that indicate in which of the advertising zones the road segment is located. In contrast, Polyakov merely describes the server determining the zone using the location (latitude and longitude from GPS) information from the vehicle. (*see*: Polyakov: column 2, lines 59-67).

Second, Taschereau discloses a location-based information service, similar to a 411 information service. (*see*: Taschereau: page 7, paragraph 0104). A user calls the service, speaks the state, city and street intersection corresponding to his or her current location, speaks a keyword for a desired point of interest, such as gas station, and indicates how far to

search from the current location. (*see*: Taschereau: page 7, paragraph 0108, lines 1-3, paragraph 0109, lines 1-2, paragraph 0110, lines 1-2, paragraph 0113, lines 1-3). The service provides matching points of interest and optionally provides an advertisement corresponding to a matching establishment and offers to connect the call to the matching establishment. (*see*: Taschereau: page 8, paragraphs 0133-0135). Taschereau also discloses grouping road segments into a group and associating the group with a geographic region, such as a city, county, state. (*see*: Taschereau: page 4, paragraph 056, paragraph 057, lines 1-3, paragraph 059, lines 1-5).

The Office Action indicated that although Taschereau does not disclose associating road segment data with advertising zone data, it would have been obvious to combine Polyakov's advertising zones with Taschereau's geographic regions. (*see*: Office Action, page 11). Applicants respectfully believe that there is no suggestion or motivation to combine the references. Applicants respectfully point out that for there to be a suggestion or motivation to combine prior art references, the proposed modification cannot change the principal operation of a reference and cannot render the prior art unsatisfactory for its intended purpose. (*see*: MPEP 2143.01). First, the advertising zones of Polyakov do not follow the geographic regions, such as city, county, state, zip code, of Taschereau. In fact, if the advertising zones were established along the geographic regions of Taschereau, the Polyakov system would not work for its intended purpose. For example, Polyakov displays the same news in different languages depending on the zone, e.g. the news is displayed in Chinese when passing a zone representing a Chinese-speaking neighborhood. (*see*: Polyakov: column 3, lines 54-56). In a typical city, certain areas may include a Chinese-speaking or Spanish-speaking population and these areas do not follow government established districts. Accordingly, for Polyakov to function for its intended purpose, the advertising zones do not follow the geographic regions of Taschereau.

Furthermore, the Polyakov system relies on latitude and longitude to determine which advertising zone the vehicle is located. (*see*: Polyakov: column 2, lines 59-67). If the advertising zone data were associated with road segment data, the Polyakov system would have to first locate the latitude and longitude position onto a road segment before identifying the advertising zone that is associated with the road segment. In contrast, the Taschereau

system receives the street name or intersection directly from the user. Thus, the principal operation of the Polyakov system would have to be significantly changed to achieve the modification of the road segment data associated with the advertising zones. Thus, there is no suggestion or motivation to combine the teachings of Polyakov and Tashereau.

Because the combination of Polyakov and Taschereau fails to disclose all of the limitations of Applicants' Claim 1 and there is no motivation or suggestion to combine the references, Claim 1 is not obvious in view of the combination. Applicants respectfully request that the rejection of Claim 1 be withdrawn.

Claim 7

Applicants' independent Claim 7 was rejected as being obvious in view of the combination of Polyakov and Taschereau. Claim 7 relates to a method of facilitating delivery of advertising to users of geographic data. Claim 7 recites in a geographic database associating with each data entity that represents a road segment data that indicate in which of said advertising zones the road segment is located. As discussed above in conjunction with Claim 1, Claim 7 is not obvious in view of the combination of Polyakov and Taschereau because the combination fails to disclose this claim element and there is no motivation or suggestion to combine the references.

Claim 13

Applicants' independent Claim 13 was rejected as being obvious in view of the combination of Polyakov and Taschereau. Claim 13 recites advertising zone data associated with road segment data. As discussed above in conjunction with Claim 1, Claim 13 is not obvious in view of the combination of Polyakov and Taschereau because the combination fails to disclose this claim element and there is no motivation or suggestion to combine the references.

Claim 18

Applicants' independent Claim 18 was rejected as being anticipated by Polyakov. Claim 18 relates to a method of delivering advertising to users of mobile computing platforms

that provide navigation-related services. Claim 18 recites providing the user with an advertising message, wherein the advertising message is provided via a user interface of the mobile computing platform that provides navigation-related services. Claim 18 is not anticipated by Polyakov because Polyakov does not disclose or suggest this claim element.

Polyakov discloses a system that provides advertising on display screens mounted on the exterior of mobile vehicles, such as a type of mobile billboard. (*see*: Polyakov: FIG. 3, column 2, lines 54-59). The advertising provided on the screens is visible to drivers of other vehicles. (*see*: Polyakov: FIG. 3, column 2, lines 54-59). However, Polyakov completely fails to mention the mobile computing platform that provides navigation-related services. Moreover, Polyakov fails to disclose or suggest providing the advertising message via a user interface of the mobile computing platform that provides navigation-related services. In contrast, Polyakov system does not include a mobile computing platform that provides navigation-related services, such as a navigation system; rather, Polyakov is merely a mobile sign or billboard that provides advertising to individuals outside the mobile vehicle, such as drivers of other vehicles.

Because Polyakov fails to disclose all of the limitations of Applicants' Claim 18, Polyakov does not anticipate this claim. Applicants respectfully request that the rejection of Claim 18 be withdrawn.

Claim 20

Applicants' independent Claim 20 was rejected as being anticipated by Polyakov. Claim 20 relates to a method of providing advertising to users of mobile computing platforms. Claim 20 recites using a geographic database to determine on which road segment the mobile computing platform is located based on the current position of the mobile computing platform and to identify in which of the advertising areas the mobile computing platform is located by identifying the advertising area associated with the road segment on which the mobile computing platform is located. Claim 20 is not anticipated by Polyakov because Polyakov does not disclose or suggest these claim elements.

Polyakov discloses a system that provides advertising on display screens mounted on the exterior of mobile vehicles, such as a type of mobile billboard. (*see*: Polyakov: FIG. 3,

column 2, lines 54-59). Although Polyakov discloses the mobile vehicles having a location determination means with GPS (*see*: Polyakov: column 2, lines 59-67), Polyakov completely fails to mention using a geographic database to determine on which road segment the mobile computing platform is located and to identify the advertising areas associated with that road segment. In contrast, Polyakov merely describes the server determining the zone using the location (latitude and longitude from GPS) information from the vehicle. (*see*: Polyakov: column 2, lines 59-67). Polyakov does not use a geographic database to determine on which road segment the vehicle is located.

Because Polyakov fails to disclose all of the limitations of Applicants' Claim 20, Polyakov does not anticipate this claim. Applicants respectfully request that the rejection of Claim 20 be withdrawn.

Claim 25

Applicants' independent Claim 25 was rejected as being anticipated by Polyakov. Claim 25 relates to a method of delivering location-based warnings to users of mobile computing platforms. Claim 25 recites providing a user of the mobile computing platform with a warning message associated with the zone in which the mobile computing platform is located. Claim 25 is not anticipated by Polyakov because Polyakov does not disclose or suggest this claim element.

Polyakov discloses a system that provides advertising on display screens mounted on the exterior of mobile vehicles, such as a type of mobile billboard. (*see*: Polyakov: FIG. 3, column 2, lines 54-59). The Polyakov system also discloses providing news to the mobile vehicles. (*see*: Polyakov: column 3, lines 48-50). However, Polyakov fails to disclose or suggest providing the warning message associated with the zone in which the vehicle is located. In contrast, the news of Polyakov is not a warning message associated with the zone; rather, the news of Polyakov is general information not specific to the particular zone because the same news is displayed in different languages depending on the zone, e.g. the news is displayed in Chinese when passing a zone representing a Chinese-speaking neighborhood. (*see*: Polyakov: column 3, lines 54-56). The Office Action indicated that Polyakov information is displayed to prevent accidents is equivalent to providing warning messages.

(Office Action, page 6). Applicants respectfully point out that in Polyakov the advertising messages and news display is adjusted such that when the vehicle is moving at higher speed the image on the display is immobile and when the vehicle is stopped the images change on the display (*see*: Polyakov: column 5, lines 25-35) is not the claim element of providing warning messages. In contrast, this speed of display feature of Polyakov promotes traffic safety by minimizing distraction to drivers of other vehicles.

Because Polyakov fails to disclose all of the limitations of Applicants' Claim 25, Polyakov does not anticipate this claim. Applicants respectfully request that the rejection of Claim 25 be withdrawn.

Claim 28

Applicants' independent Claim 28 was rejected as being anticipated by Polyakov. Claim 28 relates to a method of providing advertising to users of mobile computing platforms. Claim 28 recites dynamically forming a new advertising zone associated with the position of the mobile computing platform. Claim 28 is not anticipated by Polyakov because Polyakov does not disclose or suggest this claim element.

Polyakov discloses a system that provides advertising on display screens mounted on the exterior of mobile vehicles, such as a type of mobile billboard. (*see*: Polyakov: FIG. 3, column 2, lines 54-59). Polyakov discloses a server receiving location information from the mobile vehicle and the server determines a zone in which the vehicle is located. (*see*: Polyakov: column 3, lines 59-67). Polyakov fails to disclose or suggest dynamically forming a new advertising zone. In contrast, Polyakov never forms (or suggests to form) a new advertising zone; rather, Polyakov uses pre-established or predefined zones.

Because Polyakov fails to disclose all of the limitations of Applicants' Claim 28, Polyakov does not anticipate this claim. Applicants respectfully request that the rejection of Claim 28 be withdrawn.

Claims 2-6, 8-12, 14-17, 19, 21-24 and 26-27

Applicants' dependent Claims 2-6, 8-12, 14-17, 19, 21-24 and 26-27 are allowable at least for the reason that they depend upon allowable base claims. In addition, these claims include features that are not disclosed by the cited references.

Information Disclosure Statements

Applicants have filed additional information disclosure statements on December 21, 2004 and January 4, 2005. Courtesy copies are attached for convenience.

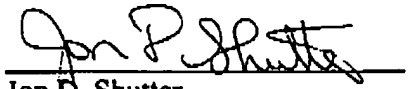
Petition for Extension of Time

Please also find included with this response a request for an extension of time to reply to the Office Action mailed September 21, 2004. Included with this request is an authorization for payment of the fee associated with this request.

Conclusion

With the present response, all the issues in the Office Action mailed September 21, 2004 have been addressed. Applicants submit that the present application has been placed in condition for allowance. If any issues remain, the Examiner is requested to call the undersigned at the telephone number indicated below.

Respectfully submitted,



Jon D. Shutter
Reg. No. 41,311
Patent Counsel

NAVTEQ North America, LLC
222 Merchandise Mart Plaza, Suite 900
Chicago, IL 60654
(312) 894-7000 x7365